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February 21, 2025

VIA ECF

The Honorable Michael E. Farbiarz
United States District Judge
U.S. District Court for the District of New Jersey
Frank R. Lautenberg U.S. Post Office & Courthouse
2 Federal Square
Newark, N.J. 07102

United States v. Coburn & Schwartz, 19-cr-120 (MEF)

Dear Judge Farbiarz:

We write on behalf of all parties to provide a list of the motions and requests outstanding before the Court on which the parties request rulings, as the Court requested during the February 20, 2025 conference.

- Coburn Motion *in Limine* No. 7, with respect to Confrontation Clause arguments as to Statements identified as 4 and 9 in the parties' papers. ECF Nos. 499-1, 509, 523, 606, 610, 703, 705, 708.
- Coburn Motion *in Limine* No. 8, with respect to Statement 1, which is identified in Coburn's letter dated January 8, 2024. ECF Nos. 499-1, 509, 523, 604, 612, 708.
- Coburn Motion *in Limine* No. 8, with respect to Confrontation Clause arguments as to Statement 8 and the statement concerning a red flag/willful blindness, which are identified in Coburn's letter dated January 8, 2024. ECF Nos. 499-1, 509, 523, 604, 612, 703, 705, 708.
- Coburn Motion *in Limine* No. 9. ECF Nos. 499-1, 500-1, 509, 522, 523, 708, 831, 837, 840, 844.
- Schwartz Motion *in Limine* No. 2. ECF Nos. 499-1, 500-1, 509, 522, 523, 671, 839.
- Schwartz Motion *in Limine* No. 3. ECF Nos. 499-1, 500-1, 509, 522, 523.

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The Honorable Michael E. Farbiarz

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- Government Motion *in Limine* No. 6, with respect to Schwartz's ability to introduce evidence relating to his support for the 2016 investigation. ECF Nos. 501, 510, 521, 545, 570, 582, 607, 613, 699.
- Government Motions *in Limine* Nos. 10 and 11, with respect to defendants' proposed experts Dr. Charles Goodsell, Todd Rahn, and Dr. Leslie K. John only. ECF Nos. 535, 544, 546, 641, 651, 653, 679, 681, 695, 696.

The parties are available if the Court has any questions about these outstanding items.

Respectfully submitted,

/s/ Justin D. Lerer

Justin D. Lerer

cc: All Counsel of Record (via ECF)